



Environmental Protection Agency

113 W. Main Street Collinsville, IL. 62234

618/345-4606

Refer to: LPC 16304501 - St. Clair County - East St. Louis/Milam

April 5, 1982

SCA Services, Inc.
Central Division
% Mr. Dale Dille
1838 North Broadway
St. Louis, Missouri 63102

REC'D APR 8 1982

US EPA RECORDS CENTER REGION 5



Dear Mr. Dille:

Your solid waste disposal facility located near Route 203 and I-55, north of East St. Louis, Illinois was inspected on March 31, 1982 by P. M. McCarthy, representing this Agency.

Mr. C. Ende, R. Kogler, G. Dille of SCA Services Inc., and Mr. Greg Kugler of Andrews Engineering were contacted at the time of the inspection.

The inspection disclosed the following conditions which constitute violations of the Environmental Protection Act and Chapter 7 of the Illinois Pollution Control Board Solid Waste Rules and Regulations:

✕ Evidence of past leachate flows were observed on the slope just south of the office. This area should continue to be monitored.

It was determined that you are using nonpermitted cover material at your site. This is in violation of your Permit No. 1978-23-0P.

By failure to obtain prior Agency approval for this cover material, you have exposed yourself to additional legal liabilities for violating said permit.

An additional permit violation was noted with regards to the certified clay liner in Phase II B. A temporary surface water berm had been constructed by excavating into the said liner. Because the integrity of Phase II B is now suspect, a recertification is required. Additionally, we do not concur that "the area has been graded for proper drainage and is ready to begin accepting waste". (Reference October 9, 1981 letter of Phase II certification from Andrews Environmental Engineering, Inc., to this Agency.) The entire matter of liner certification, utilizing berms for surface water control, and proper drainage should be thoroughly addressed in a supplemental permit application. Further filling in Phase II B will be viewed as filling in a nonpermitted area.

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AUG 11 1982

ILL. E.P.A. - D.L.P.C.
STATE OF ILLINOIS

All the violations cited to this point, plus the continuing operational problems with regards to Granite City Sewage sludge and reoccurring subsurface fires support the need for full compliance with item (3)(E) of Permit No. 1978-23-OP.

- 3(E) SCA shall retain the services of an independent licensed professional engineer to inspect the site on at least two days during each month of operation, for the purpose of assisting the site manager in complying with the engineering requirements of the Act, the regulations, pertinent Board orders and permits. Said engineer shall report his findings and any recommendations to the Agency following each semi-monthly inspection.

Therefore, be advised, all subsequent inspections must be in full compliance with your Operating Permit.

Significant portions of Phase I and II, and the "old barrel area" are inadequately covered with regards to daily and intermediate cover.

The old fill, west of Old Cahokia Creek, remains in violation of final cover requirements.

Solid waste was being deposited at the top of the slope. Solid waste should be deposited into the toe of the fill or into the bottom of the trench unless otherwise indicated in your permit.

Compaction was very poor in the last operated area of Phase I/Old Barrel Area. This area, plus all other violation areas were observed by Messrs. Ende, Kogler, Kugler, and McCarthy.

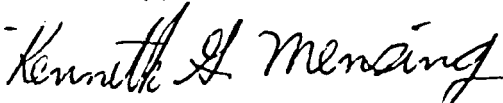
In accordance with our letters of April 22, 1981 and January 8, 1982, we are hereby placing this facility on the special waste restriction list. The following is an excerpt from the April 22, 1981 letter which outlines the conditions of this restriction.

... Should your facility ever reach the level of non-compliance, whereby it is placed on the restriction list again, be advised that it will remain on the list for two months beyond the time that a suitable level of compliance is achieved. Compliance will also have to be maintained during the two month maintenance period to assure us that you are capable of sustaining satisfactory compliance with your permit and the Rules and Regulations. The maintenance period will be further extended for any subsequent placement on the restriction list.

During the course of meetings in our office with you and Mr. Iglehart, you stated that Phase III would not be filled. Because of this, the existing permitted plans do not truly reflect the anticipated final contours or surface water drainage patterns. The amount of water observed in Phase III this date and during past inspections is of concern to us, and should be addressed in a revised closure plan.

It is suggested that you take immediate steps to resolve the conditions described above.

Sincerely,



Kenneth G. Mensing, Southern Region Manager
Land Field Operations Section
Division of Land Pollution Control

PMM:jlr

cc: Southern Region
Division File
Cecil Iglehart
T. Darrah Moore
Douglas Andrews

Enclosure: Inspection Report



217/782-5544

Re: St. Clair County, SCA/Milam LPC #16304501

July 26, 1982

REC'D AUG 3 1982

SCA Services of Illinois, Inc.
Landfill Division
2216 Madison Avenue
Granite City, Illinois

Dear Sirs:

This Agency has previously advised SCA Services of Illinois, Inc., of possible enforcement action because of non-compliance with the conditions of your permit, violations of the Illinois Environmental Protection Act, and violations of the Rules and Regulations of the Illinois Pollution Control Board at the captioned solid waste management site.

This is to further advise SCA Services of Illinois that a decision has been made to refer this matter to the Agency's legal staff for the preparation of a formal enforcement case. The case will then be referred to the Illinois Attorney General's Office for legal action.

You have thirty (30) days from receipt of this notice to meet with representatives of the Agency in order to resolve the conflicts which will lead to the filing of a formal complaint. This meeting shall be held within thirty (30) days of receipt of this notice, unless you fail to respond, notify the Agency that you will not appear or obtain the Agency's agreement to a postponement.

Please contact Joseph R. Podlewski, Jr. of the Agency's legal staff at 217/782-5544 should there be any questions regarding this matter.

Very truly yours,

Robert G. Kuykendall
Robert G. Kuykendall
Manager
Division of Land Pollution Control

RGK:JRP:jd/4882C/1

cc: Docket Control
Jim Reid, FOS Mgr.
Ken Mensing, Collinsville FOS
Joe Svoboda, Enf. Mgr.

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